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UNITED STATES DISTRICT COURT ~~AM 9:59~~
FOR THE WESTERN DISTRICT OF ~~WISCONSIN~~
~~CLERK US DIST COURT~~
~~WD OF WI~~

SAMUEL HAYWOOD MYLES, }
PLAINTIFF, }
vs. }
MEDICAL STAFF DOCTOR }
DOCTOR RAVI GUPTA }
IN HIS INDIVIDUAL CAPACITY }
and HIS OFFICIAL CAPACITY }
UNKNOWN NAME MEDICAL }
STAFF PHARMACIST IN HER }
INDIVIDUAL CAPACITY }
and HER OFFICIAL CAPACITY }
DEFENDANTS, }
et. al. }

14 C 661

COMPLAINT UNDER
AND
PURSUANT TO
BIVENS

42 U.S.C. SECTION 1983

Come now Plaintiff Samuel Haywood Myles, in and Pre-se
Complaint under and Pursuant to... Bivens... 42 U.S.C. Se-
ction 1983... for Violation of Plaintiff Constitutional Right-
t's under the Eighth and Fourteenth Amendment of the
United States Constitution.

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STATEMENT OF CLAIM

Come now Plaintiff Samuel Heywood Myles, in and Pro-
se Complaint under and Pursuant to... Bivens... 42. U.S.
C. Section § 1983... for Violation of Plaintiff Constitutional Ri-
ght's under the Eighth and Fourteenth Amendment of the
United States Constitution.

Come now Plaintiff Samuel Heywood Myles, filing and Pro-
se Complaint regarding and Medical Malpractice Claim
for Damages under and Pursuant to... Bivens... 42. U.S.C.
Section § 1983... before and within the United States Dis-
trict Court for the Western District of Wisconsin.

Plaintiff Complaint (cr) Claim is regarding to and Medi-
cal Drug Overdose from and... (incorrect dosage)... of and
high Blood pressure Medication (cr) Medicine by Federal Cor-
rectional Institutional Medical Staff at Federal Correc-
tional Institution Oxford, that's located in Oxford, Wisconsin.

Plaintiff Samuel Heywood Myles, Claim is against two In-
stitutional Medical Staff, Medical Staff Doctor, Doctor Revi-
bupta, in his Individual Capacity and his Official Capacity

STATEMENT OF CLAIM

et. al., and Unknown Name Medical Staff Pharmacist in her individual capacity and her official capacity et. al., ... and Inmate may have and liberty, interest arising from a statute, rule, or regulation written in mandatory language... .

... Due process clause may also be implicated when a prisoner's suffer's personnel injury (or) loss of property... .

Plaintiff Samuel Heywood Myles, come now before and within the United States District Court For The Western District of Wisconsin, with and claim against Medical Staff Doctor, Doctor Gupta and Medical Staff Unknown Name Pharmacist, Claim for their Negligent (or) Wrongful act or omission actions within the scope of his (or) her, office of employment Medical Staff have and has... .(Violated)... . or herein... .(Violation) ...of... .(1). DUTY: in act or course of action that is demanded of one... .(2). BREACH: to fail to fulfill (a promise)... .(3). CALLIGATION: the act or process of culling... .(4). DAMAGES: loss (or) harm resulting from injury to person... .

A. (2).

STATEMENT OF CLAIM

resulting from injury to person, ...

Plaintiff claim the Medical Staff (or) official's must provide (Plaintiff), Inmates with fair treatment, Medical Staff (or) Prison Official's must comply with their own mandatory regulation.

... Plaintiff claim regarding and Medical Malpractice Claim for contribution, compensatory Damages and Punitive Damages regarding and Medical Drug Overdose from (and) incorrect dose of... (HIGH BLOOD PRESSURE MEDICATIONS (or) MEDICINES)...

... (1)... (CLODIPINE)... (2)... (LISINOPR)...

Plaintiff Samuel Haywood Myles, who on end routine visit to Medical for... (Hypertension)... Institutional Medical Staff Doctor, Doctor Reibente, would personally prescribed end second Medication (or) Medicine for... (Hypertension)... (LISINOPR)... Institutional Medical Staff Doctor, Doctor Reibente, didn't request end routine visit (or) any form of regular

STATEMENT OF CLAIM

monitoring of Plaintiff blood pressure before (or) when placing Plaintiff on the Medication (or) Medicine... (LISINOPRIL).

... (Claim against Defendant for injuries sustained as a result of a Medical-Overdose)
... (Claim against Defendant who is liable for the amount of unreasonably dangerous cause by and Medical-Overdose)... (Claim against Defendant for being in Violation of Duty, Breach, Negligence and Damages in regard to and Medical-Overdose)... (Claim against Defendant for Violation of Plaintiff Constitutional Right's under the Eighth Amendment of the United States Constitution)... (Claim against Defendant for Violation of Plaintiff Constitutional Right's under the Fourteenth Amendment of the United States Constitution)... (Claim against Defendant for failure to monitor Plaintiff blood pressure before placing Plaintiff on the Medication (or) Medicine LISINOPRIL)... (Claim against Defendant for duty to protect

STATEMENT OF CLAIM

Plaintiff from harm, and to provide Plaintiff with reasonable Medical Care)... (Claim for Compensatory Damages and Punitive Damages from Nome Defendant)... (Claim against Defendant in (his) INDIVIDUAL CAPACITY and HIS OFFICIAL CAPACITY et. al.,) ... (Claim against Defendant for Negligent or Wrongful act or omission acting within the scope of his office or employment)... (Claim against Defendant who acted contrary to established policy in which Plaintiff has a liberty, by establishment in the policy)... (Claim against Defendant for Violation of Plaintiff Civil Rights)... (Claim against Defendant for deliberate indifference regarding to Medical needs)... (Claim against Defendant who knew or should have known)... (Claim against Defendant regarding and incorrect dosage of Medication (er) Medicine causing end

STATEMENT OF CLAIM

adverse reaction from and combination
of two high blood pressure Medication's)
... (Claim against Defendant regarding
Plaintiff due process)... (Claim against
Defendant who prescribed the Medicati-
on LISINOPRIL and which causing Plaintiff
to seek Medical Attention)...

Plaintiff Samuel Heywood Myles, come now before a-
nd within The United States District Court For The We-
stern District of Wisconsin, with and Medical-Malpr-
actice (suit) or Claim under and Pursuant to Bivens 42
U.S.C. Section 1983... (Claim)... against Medical Staff D-
octor, Doctor Ravi Gupta, ... (Claim)... for Violation of The
Plaintiff Constitutional Right's under the Eighth and Four-
teenth Amendment of the United States Constitution.

Come now Plaintiff Samuel Heywood Myles, in and Pro-Se Com-
plaint under and Pursuant to... Bivens... against Medic-
al Staff Doctor Ravi Gupta, In His Individual Capacity and His
Official Capacity.

STATEMENT OF CLAIM

Come now Plaintiff Samuel Heywood Myles, in and Pro-
Se Complaint under and Pursuant to...Bivens...42.U.S.C.
Section §1983...for Violation of Plaintiff Constitutional Rig-
ht's under the Eighth and Fourteenth Amendment of
the United States Constitution.

Come now Plaintiff Samuel Heywood Myles, filing and Pro-
Se Complaint regarding and Medical Malpractice Claim for
Damages under and Pursuant to...Bivens...42.U.S.C.Se-
ction §1983...before and within the United States District
Court For The Western District of Wisconsin.

Plaintiff Complaint (er) Claim is regarding to and Medi-
cal Drugs Overdose from and... (incorrect dosage)... of and
high blood pressure Medication (er) Medicine by Federal
Correctional Institutional Medical Staff at Federal Correc-
tional Institution Oxford, that's located in Oxford, Wisconsin.

Plaintiff Samuel Heywood Myles, claim is against two Insti-
tutional Medical Staff, Medical Staff Doctor, Doctor Ravi Gupta,
in his Individual capacity and his Official capacity et.al.,

STATEMENT OF CLAIM

and Unknown Name Medical Staff Pharmacist in her Individual Capacity and her Official Capacity et. al.,

... and inmate may have and liberty interest arising from a statute, rule, or regulation written in mandatory language...

... due process clause may also be implicated when an prisoner's suffer's personal injury (or) loss of property...

Plaintiff Samuel Heywood Myles, come now before and within the United States District Court For The Western District of Wisconsin, with and claim against Medical Staff Doctor, Deater Ravi Gupta, and Medical Staff Unknown Name Pharmacist, claim for their Negligent (or) Wronful act or omission acting within the scope of his (or) her, Office of employment Medical Staff have and has... (Violated)... or are in... (Violation)... of... (1). DUTY. "an act or course of action that is demanded of one... (2). BREACH. "to fail to fulfill (a promise)... (3). CAUSATION. "the act or process of causing... (4). DAMAGES. "less (or) resulting from injury to person, harm... .

STATEMENT OF CLAIM

Plaintiff Claim that Medical Staff (or) officials must provide (Plaintiff), Inmate's with fair treatment, Medical Staff (or) Prison official's must comply with their own mandatory regulation.

... Plaintiff claim regarding and Medical Malpractice Claim for contribution, compensatory Damages and Punitive Damages regarding and Medical Drug Overdose from (and) incorrect dose of... (HIGH BLOOD PRESSURE MEDICATIONS (or) MEDICINES)...
... (1)...(em LOPIPINE)...(2)...(LISINOPRI)
...

Plaintiff Samuel Heywood Myles, Claim (or) Complaint against Institutional Medical Staff Unknown Name Pharmacist who personally...
... (Prepare, Preserving, compounding, and dispensing drugs)...
... at the Institution Pill line.

STATEMENT OF CLAIM

Plaintiff Samuel Haywood Myles, Claim(er) Complainant is against Institutional Medical Staff Pharmacist. (Unknown Name)... Pharmacist who personally... (PREPARE and DISPENSATION)... (Claim)... for giving... (Plaintiff)... the incorrect dose (er) the... ((HYPERTENSION MEDICATION - LISINOPRIL))... end which cause and Medical Overdose from end... (adverse reaction)... .

Plaintiff Samuel Haywood Myles, Claim that (he) Plaintiff... (was fully)... knew were that (he) Plaintiff was experiencing and near death experience from and adverse reaction caused by and from end... (incorrect dose)... due to end combination of two high blood pressure Medication's end which would cause and Medical Overdose.

... (Claim against Defendant for injuries sustained as a result of an Medical Overdose)... (Claim against Defendant who is liable for the amount of unreasonably dangerous caused by and Medical Overdose)... (Claim against Defendant for be-

STATEMENT OF CLAIM

ing in Violation of Duty, Breach, Causation and Damages in regard to and Medicel-Overdose)...(Claim against Defendant for Violation of Plaintiff Constitutional Right's under the Eighth Amendment of the United States Constitution)...(Claim against Defendant for Violation of Plaintiff Constitutional Right's under the Fourteenth Amendment of the United States Constitution)...(Claim against Defendant for failure protect Plaintiff from harm, and to provide Plaintiff with reasonable Medicel Care)...(Claim for Compensatory Damages and Penitive Damages from Name Defendant)...(Claim against Defendant in (her) INDIVIDUAL CAPACITY and HER OFFICIAL CAPACITY et. al.,)...(Claim against Defendant for Negligent or Wrongful act or omission acting within the scope of her office or employment)...(Claim against Defendant who acted contrary to established policy in whi-

A. (II).

STATEMENT OF CLAIM

ch Plaintiff has liberty, by establishment in the policy)... (Claim against Defendant for Violation of Plaintiff Civil Rights) ... (Claim against Defendant for deliberate indifference regarding to Medical needs)... (Claim against Defendant who knew or should have known)... (Claim against Defendant regarding end incorrect dose of Medication (er) Medicine causing end adverse reaction from end combination of two high blood pressure Medications)... (Claim against Defendant regarding Plaintiff due process)... (Claim against Defendant who give Plaintiff the incorrect dose (of) the... ((HYPERTENSION-MEDICATION-LISINOPRIL))... end which cause end Medical overdose tremendous... (adverse reaction)... claim do to end for... (prepare (or) preparing, preserving, compounding, end dispensing the drugs) at the Institution Pill line.

STATEMENT OF CLAIM

Plaintiff Samuel Heywood Myles, come now before on
d within The United States District Court For The Western
District of Wisconsin with and Medical-Malpractice (su-
it)er Claim under and Pursuant to Bivens 42 U.S.C. Section
31983... (Claim)... against Medical Staff Unknown Na-
me Pharmacist... (Claim)... for Violation of Plaintiff
Constitutional Right's Under the Eighth and Fourteenth
Amendment of the United States Constitution.

Come now Plaintiff Samuel Heywood Myles, in and Pre-
complaint under and Pursuant to... Bivens... against Med-
ical Staff Unknown Name Pharmacist, In Her Individual Con-
certy and Her Official Capacity.

Come now Plaintiff Samuel Heywood Myles, in and Pre-
complaint under and Pursuant to... Bivens... 42 U.S.C. Section
31983... for Violation of Plaintiff Constitutional Right's Under
the Eighth and Fourteenth Amendment of the United States
Constitution.

STATEMENT OF CLAIM

Come now Plaintiff Samuel Heywood Myles, filing and Propose Complaint regarding and Medical Malpractice Claim for Damages under and Pursuant to... Bivens... 42 U.S.C. Section § 1983... Before and within the United States District Court For The Western District of Wisconsin.

Plaintiff Complaint (or)Claim is regarding to and Medical Drug Overdose from and... (incorrect dosage)... of and high blood pressure Medication (or) Medicine by Federal Correctional Institutional Medical Staff at Federal Correctional Institution Oxford, that's located in Oxford, Wisconsin.

Plaintiff Samuel Heywood Myles, Claim is against two Institutional Medical Staff, Medical Staff Doctor, Doctor Rev. B. Upster, in his Individual Capacity and his official capacity et. al., and Unknown Name Medical Staff Pharmacist in her Individual Capacity and her official capacity et. al.,

... and Inmate may have and liberty interest arising from a statute, rule, or regulation written in mandatory language.

... due process clause may also be implicated when a prisoner's sufferer's personal injury (or) loss of property...

A. (14).

CLAIM

Come now Plaintiff Samuel Heywood Myles, in and Pro-
Se Complaint under and Pursuant to... (Bivens)... 42. U.S.C.
Section 1983... Claim that Medical Staff Doctor, Doctor Revi-
ceptor, and Medical Staff Unknown Name Pharmacist both
have and has Violated Plaintiff Constitutional Right's un-
der the Eighth and Fourteenth Amendment of the United
States Constitution.

Come now Plaintiff Samuel Heywood Myles, filing and Pro-
Se Complaint regarding and Medical Malpractice Claim. Pla-
intiff is seeking Damages under and Pursuant to... (Bivens)...
Claim before and within the United States District Court For
The Western District of Wisconsin.

Plaintiff Complaint (er) Claim is regarding to and Medical
Drug Overdose from and... (incorrect dosage)... of two high
Blood pressure Medication's (er) Medicine's by Federal Corr-
ectional Institutional Medical Staff at Federal Correctional In-
stitution Oxford, that's located in Oxford, Wisconsin.

CLAIM

Come now Plaintiff Samuel Heywood Myles, before and within The United States District Court For The Western District of Wisconsin, with and Claim against both Medical Staff Doctor, Doctor Ravi Gunter, and Medical Staff Unknown Name Pharmacist, Claim for their Negligent (er) Wrongful act or omission acting within the scope of his (er) her Office of employment (both) Medical Staff have and has... (Violated)... are in... (Violation)... of... (1). Duty,.. (2). Breach)... (3). Causation)... (4). Damages)... .

Plaintiff Claim regarding and Medical Malpractice Claim for contribution, Compensatory Damages and Punitive Damages regarding and Medical Drug Overdose from and incorrect dose of high blood pressure Medical (er) Medicine... .

Plaintiff Claim that Medical Staff (er) Official's must provide (Plaintiff) (er) Inmate's with fair treatment, Medical Staff (er) Prison official's must comply with their own mandatory regulation... .

CLAIM

... (Claim) ... injuries sustained as a result of an Medical overdose ...

... (Claim) ... is liable for the amount of unreasonably dangerous cause by and Medical overdose ...

... (Claim) ... Violation of Duty, Breach, Causation and Damages ...

... (Claim) ... Violation of Plaintiff Constitutional Rights under the Eighth Amendment ...

... (Claim) ... Violation of Plaintiff Constitutional Rights under the Fourteenth Amendment ...

... (Claim) ... Violation of Plaintiff Due Process ...

... (Claim) ... Due Process Clause may also be implicated when prisoner's settler's personal injury ...

... (Claim) ... Failure to monitor Plaintiff blood pressure ...

... (Claim) ... duty to protect Plaintiff (or) Inmate's from harm, and to provide reasonable Medical care ...

... (Claim) ... Name Defendant's set al., in his (or) her Individual Capacity and his (or) her official capacity ...

CLAIM

... (Claim) ... Negligent or Wrongful act or omission (action) within the scope of his (or) her office or employment ...

... (Claim) ... acted contrary to established policy in which Plaintiff has a liberty, by establishment in the Policy ...

... (Claim) ... Deliberate indifference regarding to Medical need's ...

... (Claim) ... Name Defendant's Knew or should have Known as to calcium channel blocker used to control high blood pressure or angina ...

Plaintiff Samuel Hollywood Myles, come now before and within The United States District Court For The Western District of Wisconsin, with and Medical Malpractice (suit) on Claim under and Pursuant to ... Bivens ... 42 U.S.C. Section 1983. . . . Claim for Violation of Plaintiff Eighth and Fourteenth Amendment Constitutional Rights.

SUPPORTING FACTS

Come now Plaintiff Samuel Heywood Myles, Filing and
Pro- Se Complaint regarding and Medical Malpractice Clai-
m for Damages under and Pursuant to... Bivens... 42.
U.S.C. Section § 1983... for Violating of Plaintiff Constitu-
tional Right's under the Eighth and Fourteenth Amendment
of the United States Constitution, before and within the
United States District Court For The Western District of Wi-
consin.

Plaintiff Samuel Heywood Myles, Complaint (or) Claim is re-
garding to and Medical Drug Overdose from and... (incorrect d-
ose)... of two high blood pressure Medication (or) Medicine ca-
used by two Federal Correctional Institutional Medical Staff at
Federal Correctional Institution Oxford that's located in Oxf-
ord, Wisconsin... (Medical Staff Doctor, Doctor Ravi Gupta,
in his Individual Capacity and in his Official Capacity et. al.,)
... and... (Unknown Name Medical Staff Pharmacist in her In-
dividual Capacity and in her Official Capacity et. al.,)...

c.(1).

SUPPORTING FACT'S

... (Fact's is that Inmate(s) may have
and liberty interest arising from a state-
te rule, regulation written in mandatory
language) ...

... (Fact's is that (Both) Name Defen-
dant(s) in this complaint Medical Staff Doc-
tor, Doctor Ravibanta, and Unknown Name
Pharmacist, (are) and (was) Negligent (or)
Wrongful act of omission while acting within
the scope of his (or) her, office of employmen-
t) ...

... (Fact is that each (Both) Name
Defendant(s) are in ... (Violation) ... of
... (1). DUTY. 'an act or course of action
that is demanded of one) ... (2). BREACH,'
to fail to fulfill (a promise) ... (3). CAUSA-
TION. 'the act or process of causing) ... (4).
DAMAGES.' loss (or) harm resulting from in-
jury to person) ...

C.(2).

SUPPORTING FACT'S

... (Fact is that Plaintiff Samuel Heywood Myles, who on end routine visit to Medical Doctor ... (Hypertension) ... Institution Medical Staff Doctor, Doctor Ravibupta, who would personally prescribed and second Medication (or) Medicine for ... (Hypertension) ... ((Medication-Lisinopril)) ... Institution Medical Staff Doctor, Doctor Ravibupta, ... (who personally didn't request end routine visit (or) any form of regular monitoring of Plaintiff Samuel Heywood Myles, blood pressure before (or) when placing Plaintiff Samuel Heywood Myles, on the Medication (or) Medicine ... (LISINOPR)) ... ((Because there are Fact Questions)) ... that Name Defendant Knew or should have Known that additional monitoring should be performed on and ... day today ... best before end while Plaintiff would be prescribed (or) taking the Medicetion ... (lisinopril) ...

c.(3).

SUPPORTING FACT'S

... (Fact is that Medical Staff Doctor, Doctor Ravi Bupta, prescribed the Medication (or) Medicine in question causing and adverse reaction from and ... (incorrect dose)... of the Medication Lisinopril and which Plaintiff Samuel Heywood Myles, would end up having and Medical overdose)... (Fact is that on and about October 8, 2012, Plaintiff Samuel Heywood Myles, wouldn't personally have and adverse reaction from and ... (incorrect dose)... of the Medication Lisinopril and which was prescribed by Medical Staff Doctor, Doctor Ravi Bupta, causing Plaintiff Samuel Heywood Myles, to have and never death experience)... (Fact is that one and about October 8, 2012, Plaintiff Samuel Heywood Myles, would personally have some several side effects Fact is that Plaintiff would become... dizziness... drowsiness... fatigued... and... weakness... before passing out)... .

C. (4).

SUPPORTING FACT'S

... (Fact is that on and about October 8, 2012, Plaintiff Samuel Heywood Myles, after collapsing (er) passing out "Plaintiff" would have to seek immediately medical attention right away Plaintiff would receive the following in the form of medical attention (IV)... intravenous drip's for Normetidine Infusion solution to keep Oxygen flowing to "Plaintiff" Samuel Heywood Myles, Brain)... (Fact is that while seeking Medical (er) Immediate Medical Attention Plaintiff Samuel Heywood Myles, would personally be hook up to and (EKG) (er) (ECG) Machine to monitor "Plaintiff" heart electrocardiograma galvanometric device that detect's and record's the minute difference in eleetropotential caused by heart action)... (Fact is that Plaintiff Samuel Heywood Myles, blood pressure would reduce and drop to ... (89 over 55)).. .

SUPPORTING FACT'S

. . . (Fact is that Plaintiff Samuel Haywood Myles, would personally receive and/or cir of . . . (crutches) . . . (Fact is that "Plaintiff" would receive the Medication (or) Medicine . . . (Ibuprofen Tablet 800mg) . . . for pain due to Plaintiff having pain in his (Plaintiff) . . . (Left Ankle) . . . (Fact is that some . . . (10 Day's Later) . . . on and about October 18, 2012, Plaintiff Samuel Haywood Myles, . . . (was fully unaware at that particular time that from the October 8, 2012, incident ended that . . . (his) . . . Plaintiff Samuel Haywood Myles, . . . (Left Ankle) . . . was . . . (Broken On Both Sides) . . . (Fact is that on and about October 18, 2012, some . . . (10 Day's Later) . . . after and from the October 8, 2012, incident ended would the Institutional Medical Staff Registered Nurse Mr. Brad Malcolm, who personally receive some three set's of X-Ray's on the computer from the Institutional X-Ray

C.(b).

SUPPORTING FACT'C

LenTech, Fact is that these "PHOTOS" would never be revealed from (his), Institutional Medical Staff Registered Nurse Mr. Brad Malcom, finding is that from reviewing and examining the... (Photographic Films), Fact is only to reveal that Plaintiff Samuel Heywood Myles, ... (Left Ankle Was Broken On Both sides)... (Fact is that on and about October 18, 2012, Institutional Medical Staff Doctor, Doctor King), who would personally fully examine Plaintiff Samuel Heywood Myles, ... (Photographic Films)... from the X-Ray's taken this occur only after the request of the Institutional Medical Staff Registered Nurse Mr. Brad Malcom, who would personally request that Doctor King, review all three set's of... (Photographic Film's) from the X-Ray's) ... (Fact is that Institutional Medical Staff Doctor, Doctor King, would reveal that from (his) Doctor King, finding is that Plaintiff Samuel Heywood Myles, have and has a... (fract-

SUPPORTING FACT'S

the left foot, left ankle and left leg)...Fact, . . . that alone with the... (Photographic)...(Film's)... would fully reveal that Plaintiff Samuel Heywood Myles, ... (Left Ankle Was Broken On Both Sides)... (Fact is that Institutional Medical Staff Doctor, Doctor King, would personally take notice at that particular time Fact is that Plaintiff Samuel Heywood Myles, ... (Left foot still continued to have swelling and discoloration in... (his)... Plaintiff left foot, toe's and left ankle at that particular time some... (10 Days later)... after the October 8, 2012, incident end... (Fact is that Institutional Medical Staff Doctor, Doctor King, would personally give Medical Staff Registered Nurse Mr. Brad McLean, ... (instructions only to recommend that Plaintiff Samuel Heywood Myles, be treated with end short-leg posterior splint ace wrap and instruction for RICE therapy and limited weight bearing...)

SUPPORTING FACT'S

... (Fact is that Plaintiff Samuel Heywood Myles, would be examined by Institutional Medical staff Doctor, Doctor King, on and about October 18, 2012, regarding and ... (fracture left foot, left ankle and left leg)... from Doctor King, finding of the... (Photographic Films)... only to reveal that Plaintiff Samuel Heywood Myles, ... (Left Ankle)... was broken on both sides... .

... (Fact is that in the form of an offer of proof, and a copy, or the original, of any documentary or evidence to be introduced would clearly show a false statement of material within the body of several documents)...

D. in part... Mile Bluff Clinic, LLP Mile Bluff Medical Center

SUBJECTIVE: Issent by Dr. Gupta after evaluation and treatment of a left ankle fracture...

SUPPORTING FACT'S

. . . (Fact is that Medical Staff Doctor, Doctor Ravi Gupta, "never" once did any form of . . . (evaluation) . . . on the (Patient) . . . Plaintiff Samuel Heywood Myles, . . . on and about October 18, 2012, in the form of an offer of proof, and a copy, or the original, of any document of evidence to be introduced would clearly show that Medical Staff Doctor, Doctor Ravi Gupta, "never" once . . . (examined) . . . Plaintiff Samuel Heywood Myles, . . . (left foot) . . . (left ankle) . . . or . . . (left leg) . . . at any given time. . . (Fact is that Medical Staff Doctor, Doctor Ravi Gupta, personally did not instruct (or) recommend that Plaintiff be treated with and short-leg posterior splint) . . . (Fact is that Medical Staff Doctor, Doctor Ravi Gupta, (1). never came into the examining room. . . (2). never examine Plaintiff. . . (3). never review the photographic films X-Ray's alone with Medical Staff Re-

SUPPORTING FACT'S

sistered Nurse Mr. Fred Melcom...

... (Fact is that in the form of an offer of proof, and a copy, or the original, of any document of evidence to be introduced would clearly show a false statement of material within the body of several documents)...

(II). in Part... Bureau of Prisons Health Services Consultation Request
Consultation/Procedure Requested:
Orthopedic Surgery

... (Fact is that in the form of an offer of proof, and a copy, or the original, of any document of evidence to be introduced would clearly show a false statement of material within the body of several documents)...

C.(II).

SUPPORTING FACT'S

(III). in pert... Bureau of Prisons Health Services Clinical Encounter - Administrative Note

Admin Note encounter performed at Health Services.

ADMINISTRATIVE NOTE I. Provider: Mcleom,
Bred RN

... X-rays were taken and Dr. Gupta viewed films and results. Verbal order to place inmate in Orthosless posterior splint, retain crutches, no weight bearing, Motrin 800 mg TID x 7 days. Schedule consult with ortho for evaluation/treatment.

Fact is that in the form of an offer of proof, and a copy, or the original, of any document (or) documentary of evidence to be introduced would clearly show a false statement... (SUBJECTIVE: Is sent by Dr. Gupta, for evaluation and treatment of a left ankle fracture, J... (X-rays were taken and Dr. Gupta, viewed films and results)...

C.(12).

SUPPORTING FACTS

specifically identify the finding and the evidence that supports "Mcintiff" and original copy to be introduced would clearly state that Medical Staff Doctor, Doctor Revil Gupta, never once did any form of evaluation and treatment regarding to Plaintiff Samuel Heywood Myles, left ankle fracture (or) did he Doctor Revil Gupta, request that Plaintiff be placed in and Ortholess posterior splint, in the form of an offer of proof, and/or copy, or the original document(s) documentary to be introduced would "clearly" state that Medical Staff Doctor, Doctor King, would personally examine Plaintiff Samuel Heywood Myles, ... (fracture left foot, left ankle and left leg and from Doctor King, finding of the... (Photographic Films or X-Ray's)... would reveal that Plaintiff Samuel Heywood Myles, ... (LEFT ANKLE)... was broken on both sides "Fact" is that Doctor King, would be the one who would recommend Plaintiff Samuel Heywood Myles, to be treated with and short-leg posterior splint.

SUPPORTING FACTS

Fact is that Institutional Medical Staff Pharmacist ... (Unknown Name Pharmacist) ... who personally ...

- (1). Preparing
- (2). Preserving
- (3). Compounding
- (4). Dispensing

... the incorrect dose of the (Hypertension Medication (or) Medicine Lisinopril) and which would cause and Medical Overdose from and adverse reaction ...

Fact is that Unknown Name Pharmacist was Negligent or Wreakful act or omission acting within the scope of (her) office or employment for injuries sustained as a result of an overdose of the Medication (or) Medicine ... Lisinopril ...

Fact is that Unknown Name Pharmacist ... (Violated) ... (1). Duty ... (2). Breach ... (3). Causation and (4). Damages regarding Plaintiff Samuel Heywood Myles, due process may also be implicated where prisoner suffer's personal injury.

c. (14).

SUPPORTING FACT'S

Fact is that Medical Staff Unknown Name Pharmacist who personally... (prepare... preserving)... compounding... and dispensing)... the Medication (or) Medicine lisinopril knew or should have known that failure to monitor Plaintiff Samuel Heywood Myles, blood pressure would cause ((him)) Plaintiff Samuel Heywood Myles, harm...

Fact is that Medical Staff Unknown Name Pharmacist failure to have Plaintiff Samuel Heywood Myles, blood pressure check or to check for any possible side effects that may occur while taking end second (or) two calcium channel blocker used to control high blood pressure or anyone.

Fact is that form of an offer of proof, and a copy, or the original, of and document (or) documentary of evidence to be introduced would clearly show that Medical Staff Unknown Name Pharmacist that on and about October 8, personally would... (prepare)... (preserving)... (compounding)... (and dispensing)... all Medication's (or) Medicine's for the Institution morning)... (Pill-Line)... .

FACT'S

Come now Plaintiff Samuel Heywood Myles, in and Pro-Se
Complaint under and Pursuant to... BIVENS... 42 U.S.C. SECTION §1983... before and within The United States District Court For The Western District of Wisconsin.

Plaintiff Samuel Heywood Myles, filing and Pro-Se Complaint regarding and Medical Malpractice Claim for Damages under and Pursuant to... BIVENS... 42 U.S.C. SECTION §1983... for and regarding to and Medical Drug Overdose from and... (incorrect-doses)... of several... (high blood-pressure "Medications")... by Federal Correctional Institutional Medical Staff at Federal Correctional Institution Oxford, that's located in Oxford, Wisconsin.

Plaintiff Samuel Heywood Myles, filing and Pro-Se Complaint regarding and Medical Malpractice suit before and in The United States District Court For The Western District of Wisconsin against the name(s) Defendant's in his/her Individual Capacity and Official Capacity et. al.

D.(1).

FACT'S

Institutional Oxford Medical Staff Doctor, Doctor Ravi Gupta, and the Institutional Oxford... (Unknown)... Name Medical Staff Pharmacist, for injuries sustained as a result of an incorrect dose of and (combination) of both high blood pressure Medications...

(1)...(cm LODIPINE)...

(2)...(LISINOPR)...

Plaintiff Samuel Haywood Myles, who on end routine visit to Medical for... (Hypertension)... Institutional Medical Staff Doctor, Doctor Ravi Gupta, would personally prescribed and record Medication for... (Hypertension)... Institutional Medical Staff Doctor, Doctor Ravi Gupta, didn't request end routine visit (or) regular monitoring of Plaintiff blood pressure before (or) when placing Plaintiff on the Medication... (LISINOPRIL)...

On end about October 8, 2012, Plaintiff Samuel Haywood Myles, would personally have end adverse reaction from end combination of both blood pressure Medication's... (1).cm LODIPINE... (2). LISINOPRIL.

D.(2).

FACT'S

On and about October 8, 2012, after some several day's of being schedule or require to go to Medicel for the institutional morning Pill-Line at (or) around 7:30AM so Plaintiff Samuel Heywood Myles, could take (his) assign Medication's at that particular time...

- (1)...(ASPIRIN)...
- (2)...(amlodipine)...
- (3)...(LISINOPRIL)...
- (4)...(TRIAMTERENE)...

On and about October 8, 2012, after the 10:00AM mornin' count around 10:20AM Plaintiff Samuel Heywood Myles, would become light headed and at that particular time Plaintiff would personally inform Wood Unit Officer Mr. Grensee, before passing out and collapsing into and second Inmate cmr's by the (Name) of... (Eric Hobody)...

FACT'S

At that particular time Plaintiff Samuel Heywood Myles, ... (was - fully) ... aware that he was experiencing and near death experience from and adverse reaction caused by and ... (incorrect dosage) ... due to and combination of two high blood pressure Medications in which would cause and Medicel Overdose.

In Part:

... PATIENT MEDICATION INFORMATION. . .

... CML DIPINE / and LISINOPRIL . . .

CAUTIONS:

This Medication May Cause Drowsiness
or Dizziness

This medicine may cause dizziness, lightheadedness, or fainting

D.(4).

FACT'S

POSSIBLE SIDE EFFECTS.

SIDE EFFECTS that may occur while taking this medicine include: dizziness; drowsiness; fatigue; or weakness.

SEEK MEDICAL ATTENTION RIGHT AWAY if any of these SEVERE side effects occur: fainting; severe or persistent dizziness; but seek immediate medical attention if it occurs.

Overdose:

If overdose is suspected contact your local poison control center or emergency room immediately. Symptoms of overdose may include dizziness, fainting, and a fast heartbeat.

D.(5).

FACT'S

NOT include all information about the possible uses, directions, warnings, precautions, interactions, adverse effects, or risks that may apply to this (or) these... (Medicine)...

Document In Pert.

Bureau of Prisons Health Services Clinical
Encounter. Page... (5 of 6)...

Assessment.

Other

Near syncope episode.

Unit Officer Mr. Grensee, called for a medical emergency in Wood Unit common area for an inmate feeling dizzy. I was instructed to bring a wheelchair. Found I/M Myles, A&O x 3 (Person, Place, Time) he was a bit confused to the situation that just happened.

D.(L).

FACT'S

He remember being dizzy and having someone catch him prior to hitting the floor. Bystanders informed me Myles, did not hit his head on the floor when he fell. Another inmate caught him and assisted him as he twisted to the floor.

Myles, was alert, his airway was patent and open. He was breathing slightly fast but not respiratory distress. He was able to speak in full sentence without dyspnea. His skin color was pale and slightly clammy to touch. His initial radial pulse was slow but strong. We moved Myles, to the wheelchair and transported him to the medical dept.. urgent care.

Institutional Medical Staff Registered Nurse Mr. Brad McLean, would rush over to Wood Housing Unit only after being informed of an Medical emergency and was requested to arrive with a wheelchair only to rush Plaintiff Samuel Haywood Myles, over to Medical to seek immediate Medical Attention first upon arrival at Medical Plaintiff would receive.

D.(7).

FACT'S

... (IV) intravenous drip per Normoseli-
ne Infusion solution to keep... (OXYGEN FLOW-
ING to Plaintiff Brain)... .

While seeking Medical (er) Immediate Medical Attention
Plaintiff Samuel Heywood Myles, would personally be hook up
to and... .

... (EKG-(er)-ECG) Machine to monitor
Plaintiff heart electrocardiogram galvan-
ometric device that detect's and record's
the minute difference in electropotential
cause by heart action... .

Plaintiff Samuel Heywood Myles, from this near death ex-
perience and adverse reaction from and Medical Drug Over-
dose from and combination of both high blood pressure
Medication's.

... (amLODIPINE)... (LISINOPRIL)... .

- COMMON USES. These medicine is a calci-
um channel blocker used to control high li-
blood pressure... .

D.(8).

FACT'S

... Reducing High Blood Pressure...

Plaintiff Samuel Heywood Myles, Blood pressure would drop and lower to... (89 over 55)... from this near death experience.

Third Plaintiff Samuel Heywood Myles, would receive a pair of... (Crutches)... and fourth in the form of Medication (or) Medicine some Ibuprofen Tablet 800 mg before returning back to the Housing Unit.

Some... (10-Dey's Later)... on and about October 18, 2012, Plaintiff Samuel Heywood Myles, ... (was fully unaware at that particular time that from the October 8, 2012, incident end that his) Plaintiff left Ankle was Broken on both sides)...

On and about October 18, 2012, some... (10-Dey's Later)... after end from the October 8, 2012, incident end would the Institutional Medical Staff Registered Nurse Mr. Brad Malcom, would personally receive three set's of X-Ray's on the computer from the Institutional X-Ray Len Tech

FACT'S

these "photo" would reveal from this/ Institutional Medical Staff Registered Nurse Mr. Brad Malcolm, finding is that from reviewing and examining the...(photographic films)... only to reveal that Plaintiff Samuel Heywood Myles, left ankle was broken on both sides.

On and about October 18, 2012, Institutional Medical Staff Doctor, Doctor King, who would personally, fully examine Plaintiff Samuel Heywood Myles, photographic films from the X-Ray's taken this occur only after the request of the Institutional Medical staff Registered Nurse Mr. Brad Malcolm, who would personally request that Doctor King, review all three set's of photographic film's from the X-Rays.

Institutional Medical Staff Doctor, Doctor King, would reveal that from this/ Doctor King, finding of both fully examining Plaintiff Samuel Heywood Myles, . . .

. . . fracture left foot, left ankle and left leg . . .
... alone with the photographic films would fully reveal that Plaintiff Samuel Heywood Myles, left ankle was broken on both sides . . .

D.(10).

FACT'S

Institutional Medical Staff Doctor, Doctor King, would personally take notice at that particular time is that Plaintiff Samuel Heywood Myles, left foot still continued to have swelling and discoloration in his Plaintiff left foot, toes and ankle at that particular time some... (10-Day's)... after the October 8, 2012, incident end.

Institutional Medical Staff Doctor, Doctor King, would personally give Medical Staff Registered Nurse Mr. Brad Malcolm, instructions (only) to recommend that Plaintiff Samuel Heywood Myles, be treated with and short-leg plaster splint ace wrap and instruction for RICE therapy and limited weight bearing.

On and about November 27, 2012, Plaintiff Samuel Heywood Myles, would be transported by Federal Correctional Institutional Staff from Oxford to Mile Bluff Clinic, LLP Mile Bluff Medical Center at the request of the Institutional Medical Department Head Mr. C. Lanze.

D. (11).

FACT'S

Document In Pert.

Mile Bluff Medical Center Fax
Mile Bluff Clinic, LLP
Mile Bluff Medical Center

History of Present Illness:

This 56 year old male presents with:

Lt ankle injury

SUBJECTIVE: THIS 56-year-old gentleman who is an inmate at the Oxford Correctional Institution,

treatment of a left ankle fracture.

This actually occurred on 10/08/12.

Blocked out and fell, sustaining an isolated injury to the left ankle. He was diagnosed with a lateral malleolus fracture and was treated with a short-leg posterior splint, limited weight bearing with crutches, elevation and ice,

D.(12).

FACT'S

and eventually some heel complication.

He denies any history of previous ankle injury, and this is of note because of the x-ray findings, which will be described later.

OBJECTIVE: The posterior splint is removed. There is no clinical bone deformity, although he does have a little bit of swelling medially.

The patient notes some tenderness to palpation throughout the majority of the length of the fibula, but interestingly,

he has a little bit of tenderness at the medial ankle ligament complex.

X-rays: I reviewed three sets of x-rays from Oxford.

This consists of an ankle series and a foot series from October 14th, and an ankle series from November 19th.

D.(13).

FACT'S

He has at least a couple of small cortical evasions at the tip of the medial malleolus, but the medial malleolus itself has a little bit of misshapen characterization,

ASSESSMENT. Patient with a left ankle lateral malleolar fracture, with a medial ankle sprain. He is healed enough to come out of the splint and start weightbearing as tolerated. He should discontinue the crutches when he can comfortably bear full weight, whether that is today, a couple days, or several days down the road. He should be kept from running and jumping activities, sports, and weightlifting that requires use of the lower extremities for an additional 3 weeks. Follow up will be on a p.r.n basis. Now that the splint is removed, any ankle and foot swelling may become more prominently seen and he can have the swelling come and go, depending on his level of activity, as well as amount of time of

D. (14).

FACT'S

elevation, and can be expected over the next few weeks to few months.

cc.'Rev.' Gupta, MD/Oxford Correctional Institution

Provider: Robert R. Riedle MD 11/27/2012

Electrenically signed by Robert R. Riedle MD
on 11/27/2012 09:23 AM

Fact is that Plaintiff Samuel Haywood Myles, is... (handicap) from the October 8, 2012, incident Plaintiff is unable to walk the institution issue boot's (or) any hard shoe when walking in hard boot's (or) shoe's Plaintiff foot seem to twizzle and turn and weird.

As of date Plaintiff is still having some pain (or) soreness across his left foot from ankle to ankle on both side's.

D.(15).

FACT'S

Plaintiff Samuel Haywood Myles, with pain running up and down behind his ankle end up pass his ankle some several inches also at this particular time Plaintiff walking have and has become alter in regard end (do) to his left foot and ankle also as date Plaintiff Samuel Haywood Myles, is walking with end slight limp.

Fact's is that both Doctor Ravi Gupta, and Unknown Name Pharmacist, have and has violated Plaintiff Constitutional Right's under the Eighth and Fourteenth Amendment . . . Medical staff has a duty to protect Plaintiff from harm, and to provide him reasonable medical care consistent with policies and procedures. . . Defendants Knew or should have Known. . . for their negligent or wrongful act or omission acting within the scope of their office or employment. . .

D.(1b).

RELIEF

WHEREFORE, the premises consider, the Plaintiff demands judgment against the (Name) Defendant's both in his(er) her Individual and Official Capacity regarding and... (incorrect dosage of high blood pressure medication's causing and Medical-Overdose).

Plaintiff Samuel Heywood Myles, come now before and within The United States District Court For The Western District Of Wisconsin, with and Medical-Malpractice (suit) or Claim against Medical Staff Doctor, Doctor Ravi Gupta, and Unknown Name Medical Staff Pharmacist, Plaintiff seeking contribution for both Compensatory Damages and Punitive Damages for their Negligent or Wrongful act or omission acting within the scope of his(her) office or employment.

(1). Plaintiff Samuel Heywood Myles, is seeking... (Relief)... contribution in compensatory Damages and Punitive Damages against Medical Staff Doctor, Doctor Ravi Gupta, who... (PREScribed)... the... (Second)... medication (er) medicine that's in question.

RELIEF

Medical Staff Doctor, Doctor Ravi Gupte, was Negligent or Wrongful within the act or omission while acting within the scope of his office or employment.

Medical Staff Doctor, Doctor Ravi Gupte, never requested for any additional monitoring before placing Plaintiff on the... (Second)... medication (or) medicine end which Plaintiff Samuel Heywood Myles, would sustained injuries as a result of an overdose.

(2). Plaintiff Samuel Heywood Myles, is seeking... (Relief)... contribution in compensatory Damages and Punitive Damages against Medical Staff Unknown Name Pharmacist who... (Preparing, preserving, compounding, and dispensing drugs)...

Medical Staff Unknown Name Pharmacist, was Negligent or Wrongful within the act or omission while acting within the scope of her office or employment.

E.(2).

RELIEF

Medical Staff Unknown Name Pharmacist, ... never question Plaintiff Samuel Heywood Myles, before ...

... (preparing, preserving, compounding, and dispensing drugs) ...

... regarding the second Medication (or) Medicine in question ... (LISINOPRIL) ... or both prescribed high blood pressure Medications concerning the amount of dosage, .

Plaintiff Samuel Heywood Myles, in and Pre- & Complaint seek Relief under and Pursuant to ... Bivens ... 42 U.S.C. Section 1983 ... for Violation of Plaintiff Constitutional Rights under the Eighth and Fourteenth Amendment of the United States Constitution, Institutional Oxford Medical Staff Doctor, Doctor Rev. Bentz, and the Institutional Oxford Unknown Name Medical Staff Pharmacist Loth in his (or) her's Individual Capacity and Official Capacity et. al, for injuries sustained as a result of an incorrect dose of Medication causing and Medical Overdose.

JURY TRIAL DEMAND.

DEMAND FOR JURY TRIAL, Compensatory and exemplary damages set forth in the instant of this complaint therefore Plaintiff hereby exercises his Second Amendment Constitutional Right to have all genuine issues of material fact's address in controversy, determined, solely by a jury selected properly from within the judicial district as prescribed by law.

I am requesting that a subpoena D.T. to the Warden at Federal Correctional Institution Oxford that's located in Oxford, Wisconsin as custodian of the records the following records are Material to my case at Bar end I am unable to proceed without them.

(1). any and all documents(s), Rec, Written (or) other WISP And to please issue a magistrate order for the U.S. Marshal's Office to serve the... (SUBPOENA WITH OUT COST)...

F(1).

CERTIFICATE OF SERVICE

I, Samuel Haywood Myles, hereby certify that I have served a true and correct copy of the following:

Filed and Complaint for Violation of
Civil Right's under the Civil Right's Act
42 U.S.C. Section 1983

United States District Court For The
Western District of Wisconsin

Which is deemed filed at the time it was delivered to
prison authorities for forwarding to the Court,

Houston vs. Leck, 101 L.Ed. 2d 245 (1988)
upon the court and parties to litigation and or his/her at-
torney(s) of record, by placing same in a sealed, postage
prepaid envelope addressed to:

By way of the U.S. Mail to...
United States District Court For The
Wisconsin District of Wisconsin

U.S. Courthouse
120 North Henry Street Room 320
Madison, Wisconsin 53703

and deposited same in the United States Postal Mail at the
Federal Correctional Institution Milan located in Milan, Michigan.
this 24 day of September 2014... Samuel Haywood Myles